

January 19, 2017

**VIA ECFS**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth St., SW  
Washington, DC 20554

Re: *Notice of Ex Parte Presentation – CG Docket Nos. 12-32 and 13-46; WT Docket Nos. 07-250 and 10-254*

This is to notify you that on January 17, 2017, that the undersigned, representing CTIA and the Consumer Technology Association (collectively, the “Associations”), met with Commission staff and others from the private sector regarding the above-captioned proceeding.<sup>1</sup>

Commission attendees were Karen Peltz Strauss (by phone), Suzy Rosen Singleton, Robert Aldrich, and Susan Bahr of the Consumer and Governmental Affairs Bureau. Also in attendance were Thomas Goode of Alliance for Telecommunications Industry Solutions; Stephen Berger of ANSI ASC C63<sup>®</sup> Subcommittee 8 and consultant to Hearing Industries Association (“HIA”); James Bress of AST Technology Labs Inc. and TIA TR-41.3; and Steve Whitesell of Whitesell Consulting LLC (all by phone); Laura Stefani of Fletcher, Heald & Hildreth, representing HIA; James Reid of the Telecommunications Industry Association (“TIA”); and Rachel Wolkowitz of Wilkinson Barker Knauer, representing TIA.

During the meeting, on behalf of the Associations, I discussed with Commission staff a number of hearing aid compatibility (“HAC”) standards issues posed in the proceeding,

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<sup>1</sup> See *Access to Telecommunications Equipment and Services by Persons with Disabilities; Petition for Rulemaking Filed by the Telecommunications Industry Association Regarding Hearing Aid Compatibility Volume Control Requirements; Amendment to the Commission’s Rules Governing Hearing Aid-Compatible Mobile Handsets; Comments Sought on 2010 Review of Hearing Aid Compatibility Regulations*, Notice of Proposed Rulemaking, 30 FCC Rcd 12219 (2015) (“NPRM”).

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including Commissioner O’Rielly’s separate statement on the *NPRM* regarding inappropriate Commission intervention in the standards process.<sup>2</sup>

To reiterate CTIA’s reply comments on the *NPRM*,<sup>3</sup> the Commission should not adopt volume control requirements for wireless handsets, which are unnecessary in light of modern wireless handset capabilities and existing regulations.<sup>4</sup> In addition, because the current ANSI standards process meets all of the criteria of Section 710(c) of the Communications Act, the Commission should avoid creating specific rules for consumer stakeholder consultation in the standards process.<sup>5</sup> Because the existing ANSI standards process already meets the terms of Section 710(c), manufacturers should be able to use updated HAC standards prior to their adoption by the Commission.

Pursuant to Section 1.1206 of the Commission’s rules,<sup>6</sup> this letter is being electronically filed with your office and a copy of this submission is being provided to the meeting attendees from the Commission. Please let the undersigned know if you have any questions regarding this filing.

/s/ William F. Maher

William F. Maher  
*Counsel to CTIA and the Consumer  
Technology Association*

cc: Karen Peltz Strauss  
Suzy Rosen Singleton  
Robert Aldrich  
Susan Bahr  
Julie Kearney, Consumer Technology Association  
Kara Romagnino, CTIA

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<sup>2</sup> See Statement of Commissioner Michael O’Rielly Approving in Part, Dissenting in Part, *NPRM*, 30 FCC Rcd at 12269-12270.

<sup>3</sup> See Reply Comments of CTIA, CG Docket Nos. 12-32 & 13-46; WT Docket Nos. 07-250 & 10-254 (filed Mar. 28, 2016) (“*Reply Comments*”).

<sup>4</sup> *Reply Comments* at 2-4.

<sup>5</sup> See *id.* at 6-7

<sup>6</sup> 47 C.F.R. § 1.1206.